

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

EYAL R.D. CORP.,

Plaintiff,

v.

Case No. 07-cv-13 (AKH)

Jewelex New York Ltd., Inc.,

Defendant.

**JOINT PROPOSED VOIR DIRE QUESTIONS**

Plaintiff, Eyal R. D. Corp. ("Plaintiff" or "Eyal"), and Defendant, Jewelex New York Ltd., Inc. ("Defendant" or "Jewelex"), through their respective counsel, pursuant to the Individual Practices of Judge Hellerstein, respectfully submit the following proposed voir dire questions.

**Questions Proposed by Both Plaintiff and Defendant:**

1. Who has any experience, training, or familiarity with product invention, product design, or product manufacturing?
2. Who has any experience, training, or familiarity with how the jewelry industry works?
3. Are you currently, or have you ever been employed in the jewelry design or manufacturing business?
  - a. If so, please describe the job or jobs you have held in the jewelry design/manufacturing business?
  - b. Would this employment affect your ability to decide a case solely on the evidence you will hear and see in this courtroom?
4. Are you currently, or have you ever been employed in the business of jewelry sales?
  - a. If so, please describe the job or jobs you have held in jewelry sales?
  - b. Would this employment affect your ability to decide a case solely on the evidence you will hear and see in this courtroom?
5. Who here has the feeling that the fashion or jewelry or clothing design industries are totally disinteresting to you, or even an unnecessary waste of time?
6. Who has the feeling that most jewelry looks pretty much the same to you?
7. Who has the feeling that most diamond rings look pretty much the same to you?

8. Are you familiar either with the company Fred Meyer Jewelers, Inc. or the company Whitehall Jewelers, Inc.?
9. Who here has any work experience, training, or familiarity with our country's copyright laws?
10. Have you ever applied for a copyright registration -- either for yourself or your employer?
  - a. What was it for?
  - b. Was it granted or denied?
  - c. Would your experience with a copyright registration affect your ability to decide a case solely on the evidence you will hear and see in this courtroom?
11. Who has the feeling that a company should not be allowed to copyright a product that simply combines several features that have already been done before, even if the new product is the first time those features have been combined together?

**Additional Questions Proposed by Plaintiff:**

1. What is your current occupation, and what kind of work does it involve?
2. What has been your primary occupation for most of your life, and what did it involve?
3. Who has the feeling that decorative products like jewelry or artwork or house decorations or fashionable clothing are unnecessary or a waste of money?
4. Who here prefers to save money by buying less expensive, generic non-brand name products instead of buying well-known brand names?
5. Who has the feeling that it seems difficult to believe that a large company would ever knowingly violate the law or engage in illegal business practices?
6. Who has the feeling that it seems difficult to believe that a company would ever knowingly copy and sell a competitor's copyrighted product?
7. Has anyone here ever seen an unauthorized "knockoff" product for sale?
8. Has anyone here ever worked at a company that paid close attention to the new products your competitors were developing or putting on the market?
9. Who has the feeling that copying competitors' products is a normal, everyday practice in the business world that most companies engage in?
10. Who has the feeling that product designers who invent a new product should be more focused on making the best version of their product instead of stopping other companies from selling their own versions?
11. Who has the feeling that companies shouldn't be suing competitors for copyright infringement, they should be making a better product instead?

12. Who agrees a little with the saying "all is fair in business?"
13. Who has the feeling that the business world is so competitive that companies should be allowed to bend and break the rules and laws sometimes?
14. Who here has the feeling that the business world is so competitive that it would be unfair to blame a company for copying a competitor's products, even if the products were copyrighted?

Dated: January 13, 2012  
New York, New York

Respectfully,

HURON LAW GROUP

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